

VICTOR MANUEL TORRES

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Attorney for Defendant
CHARMAIGNE ESPARZA

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHARMAIGNE ESPARZA,

Defendant.

Case No. 07CR3148-BTM

**DECLARATION OF COUNSEL
IN SUPPORT OF APPLICATION
FOR ORDER AUTHORIZING
EXTRAORDINARY
INVESTIGATOR FEES
(18 U.S.C. 3006A(e)(1))**

I, VICTOR MANUEL TORRES, do hereby declare and state:

(1) I am an Attorney duly licensed to practice law in the courts of the State of California, the United States District Court for the Southern District of California and the United States Supreme Court;

(2) I am court appointed counsel for defendant CHARMAIGNE ESPARZA in the above-entitled Criminal matter, having been appointed pursuant to Title 18 U.S.C. Section 3006A;

(3) Presently, the defendant is charged with Title 18 U.S.C. § 1324 (a)(1)(A)(iii), Harboring and Concealing.

(4) Ms. ESPARZA is requesting the court to approve an additional fifteen (15) hours of investigation time above and beyond the 9.0 hours of time permitted under the Criminal Justice Act for a total of 24 hours, at a rate of \$55.00 an hour, not to exceed a total of \$1325.00 for investigator fees. This investigation is to be conducted by private investigator

1 Esther Sardina, License No. PI 25143, 105 West "F" Street, San Diego, California, 92101.

2 These funds are necessary in order to perform the following investigation:

- 3 a. Meetings with defendant and/or counsel for defendant;
4 b. Telephone conferences with counsel and family of defendant;
5 c. Locate and interview witnesses in Riverside County;
6 d. Prepare reports and memoranda for counsel for defendant.

7 (5) Because Ms. ESPARZA has no money to pay for this investigation, counsel
8 requests that this Court approve investigator fees in the total amount of \$1325.00 so that this
9 case may be fully investigated. Without these additional funds, the representation of Ms.
10 ESPARZA would not be adequate;

11 Therefore, counsel for defendant respectfully submits to this Court that these
12 additional hours are necessary at this time in order to complete the preparation of the defense
13 in his case.

14 I declare, under the penalty of perjury, the above to be true and correct to the best of
15 my information and belief.

16
17 DATED: January 21, 2008

S/ VICTOR MANUEL TORRES
VICTOR MANUEL TORRES, ESQ.
Declarant